

**OFFICE OF THE FEDERAL PUBLIC DEFENDER  
DISTRICT OF MARYLAND**

NORTHERN DIVISION  
TOWER II, NINTH FLOOR  
100 SOUTH CHARLES STREET  
BALTIMORE, MARYLAND 21201-2705  
TEL: (410) 962-3962  
FAX: (410) 962-0872  
TOLL FREE: (855) 213-8450

JAMES WYDA  
FEDERAL PUBLIC DEFENDER

COURTNEY D. FRANCIK  
ASSISTANT FEDERAL PUBLIC DEFENDER

May 14, 2025

The Honorable J. Mark Coulson  
United States Magistrate Judge  
U.S. District Court, District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201

Re: United States v. Mark Unkenholz  
Criminal Case No. SAG-22-0105

Dear Judge Coulson,

I write to request a modification of Mr. Unkenholz' release conditions to permit the temporary return of his passport to ensure that he can travel from his home in Washington State to Baltimore for a court appearance scheduled for next Tuesday, May 20, 2025, at 2 p.m.

Mr. Unkenholz first appeared before the Court on March 31, 2022, and was released the same day on conditions. ECF 12. Over the past three years, Mr. Unkenholz' release conditions have been modified several times to permit travel (ECF 22, 31, 47), including travel to the United Kingdom in the spring of 2024 to attend his son's graduation from Cambridge University (ECF 51). To date, Mr. Unkenholz has fully complied with his release conditions.

Mr. Unkenholz is scheduled to appear in Court next Tuesday, May 20, 2025, at 2 p.m., for a plea hearing. To travel by plane from his home in Washington State, he will need either a Real ID or U.S. passport. While he has applied for a Real ID, it may not arrive in time for the hearing. Accordingly, Mr. Unkenholz now asks the Court to modify his release conditions to permit the Court Clerk to release his passport to the Office of the Federal Public Defender, who will send the passport to Mr. Unkenholz via certified mail, so that he may use it to travel to and from Maryland next week. If his Real ID arrives in time for next Tuesday's hearing, Mr. Unkenholz can re-surrender his passport to the Court Clerk next Tuesday. If he instead requires the passport to return to Washington State, Mr. Unkenholz can re-surrender it to the Court Clerk via certified mail and provide a tracking number to both Maryland probation and his supervising officer in Washington State. All other conditions would remain in effect.

The government consents to this request. I thank the Court for its attention to this matter.

Sincerely,

\_\_\_\_\_  
/s/

Courtney D. Francik  
Assistant Federal Public Defender

Approved this \_\_\_\_ day of May, 2025,

\_\_\_\_\_  
The Honorable J. Mark Coulson  
United States Magistrate Judge